

TABLE OF CONTENTS

5 CEQA MANDATED DISCUSSION 1

 Irreversible and Irretrievable Commitment of Resources.....1

 Growth Inducing Impacts1

 Significant Unavoidable Adverse Impacts2

 Cumulative Impacts.....2

 City of Lodi2

 San Joaquin County.....3

 City of Stockton.....3

 Environmentally Superior Alternative3

5 CEQA MANDATED DISCUSSION

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Section 21100(b)(2)(B) of CEQA requires that an EIR identify any significant irreversible changes that would result from project implementation. Section 15126.2(c) of CEQA provides guidance as to what sorts of changes might be considered irreversible. Such changes include use of nonrenewable resources, commitment of future generations to similar uses, and environmental accidents that could occur as a result of the project.

The proposed project would involve construction activities that commit non-renewable resources including fuels, construction materials and land. Once constructed, project facilities would continue to use energy. The precise acreage of land that would be used by the project is approximately 400 acres.

CEQA notes that environmental accidents can cause irreversible damage, and the project will result in the expansion of recreation and commercial facilities that may use hazardous materials for field upkeep, and may generate hazardous waste. However adequate procedures are in place to guard against accidental releases of hazardous materials or hazardous waste. Measures to protect against these hazards are detailed in Section 4.4, Public Health and Safety.

GROWTH INDUCING IMPACTS

Growth inducement is defined by the CEQA Guidelines as the fostering of economic or population growth, or the construction of new housing. Growth inducement may result from direct employment, population, or housing growth; secondary or indirect growth; or provision of new infrastructure that removes obstacles to population growth.

The project is located in a rural area, surrounded by farmland and County parcels. With the addition of commercial uses, particularly retail establishments, and the hotel and dormitory, additional employees will be needed to staff the facilities. Local residents from nearby cities including Lodi and Stockton may staff the facilities, or new employees may be brought in from outlying areas and may need housing. Since sufficient housing is available in the surrounding cities, it is unlikely that agricultural land would be developed to house new employees. Development of the sports and commercial facilities within an undeveloped area and with visibility from the Interstate may result in a demand to develop other parcels along the route for commercial support services, which may encourage farmers to sell their property to developers. However, much of this land is locked in Williamson Act contracts. Standard Williamson Act contracts expire at the end of ten years and super Williamson Act contracts expire after 20 years, constraining future development in the area. A Notice of Nonrenewal on these contracts automatically unbinds the contract within nine years, whereas an application to seek cancellation from San Joaquin County (prior to an annexation) or from the City of Lodi (after annexation) is associated with significant penalties. In addition, there are no specific plans in the area outlining future development, except for the White Slough Wastewater Master Plan, which has established a number of sites for 260 potential percolation ponds. This Master Plan has also established its

need to discharge treated water and biosolids in the surrounding area, which would require additional land use for water treatment operations. Therefore, much of the land will remain in an agricultural/wastewater disposal joint land use. To prevent and discourage growth in the area, the public services and utility connections serving the facility will not be oversized. Therefore, there will not be additional services easily available for urbanization beyond the project site.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Section 2100(b)(2)(A) of CEQA requires that an EIR identify any significant environmental effects that cannot be avoided if the project were implemented. Significant unavoidable impacts are identified in Section 4 of this EIR, Environmental Analysis, as those impacts that remain significant after implementation of mitigation. Although the project has the potential to result in a number of significant environmental impacts, most of these can be avoided through the adoption of appropriate mitigation measures that will reduce those effects to a less than significant level. Significant unavoidable impacts of the project are the following:

- Conversion of agricultural land;
- Traffic impacts at project area intersections; and
- Potential effects to rural aesthetics, including light and glare.

Significant cumulative impacts are also identified for the following issues:

- Visual and aesthetic quality;
- Traffic and circulation;
- Conversion of agricultural land; and
- Cumulative air quality impacts.

CUMULATIVE IMPACTS

Cumulative impacts are defined as “two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts” (CEQA Guidelines Section 15355). Section 15130 of the CEQA Guidelines states that an EIR must discuss cumulative impacts when they are significant. In the case of the proposed project, cumulative impacts could result from the project impacts in combination with those from growth in the neighboring areas. The analysis of cumulative impacts of the project and surrounding local and subregional development are presented in Chapter 4, Environmental Analysis, under each issue area. If significant cumulative impacts are identified, mitigation measures have been recommended.

The following projects have been included in the cumulative impacts analysis:

City of Lodi

There are no other projects in the City of Lodi that would create cumulative impacts with the ProStyle Sports Complex.

San Joaquin County

There are a number of projects occurring in the vicinity if the project in San Joaquin County. Three projects are located near the intersection of I-5 and Highway 12. The Flying J Truck Stop is proposed for the northeast corner of this intersection. The truck stop will be equipped with fueling stations, a restaurant, restrooms, rest area, and other similar amenities associated with a truck stop/rest area. The second project is Flag City, which will contain a 51-unit hotel and 181 unit RV park. The third project is located somewhat further east on Highway 12 and would result in the construction of a 157-unit RV park. The County Public Works Department is preparing the fourth project, which would result in a realignment of Thornton Road at Highway 12 near the Flag City and Flying J truck stop areas.

City of Stockton

Although the City of Stockton was contacted on multiple occasions between September 26 and November 1, no response was received regarding projects within the City of Stockton that may be included in the cumulative impacts analysis.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The California Environmental Quality Act requires the identification of an Environmentally Superior Alternative; that is, the alternative that has no significant effect or has the least significant effect on the environment. For reference, significance is determined based on substantial or potentially substantial adverse changes of any of the physical environmental conditions due to the Project. The degree of change is evaluated against existing environmental conditions.

Because the No Project Alternative assumes that no development of the project would occur, this alternative is the least environmentally damaging. However, the No Project Alternative would not allow the applicant to achieve their objectives for this project.

Based on compliance with existing zoning, less visual change, uses that utilize the reclaimed water and uses that can be easily converted to agricultural use, the Sports Use Only alternative is the environmentally superior alternative that meets the objectives of this project. Although the Manteca Alternate Site would result in fewer environmental impacts to the Lodi site, its location does not meet the objectives of this project. In addition, many of the impacts from project construction would be similar at the Manteca site as at the Lodi site, resulting in an equivalent level of negative impacts. As discussed in Chapter 6 - Alternatives Analysis, the Manteca site would result in impacts to the adjacent residences, requires significant sewer service upgrades, is located in a floodplain, and directly competes with the Escalon soccer complex. Based on a comparison of the alternatives in Lodi, the Sports Use Only Alternative would result in the least amount of significant and unavoidable impacts, while still maintaining the primary goals of this project. Therefore, the Sports Use Only Alternative is considered the environmentally superior alternative.